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Perkins on Privacy

CCPA 12-Month Compliance Series Part 1: Participate in Rulemaking

The California Office of the Attorney General (OAG) will be promulgating regulations to further and provide guidance regarding the California Consumer Privacy Act (CCPA). You can participate in the rulemaking process. The OAG is holding public forums where all members of the public are invited to speak ([RSVP](#)) or simply attend. We reported on the first two forums in San Francisco and San Diego [here](#). Last week, forums were held in Los Angeles and Riverside, where the following new topics were raised:

- **"Do Not Sell" icon.** Speakers requested that instead of requiring businesses to provide a "Do Not Sell My Personal Information" link on their homepage, a logo be developed and permitted to be used instead. One speaker pointed out that the "Do Not Sell" link would have to be placed on all businesses that are subject to the CCPA, including those that do not sell personal information.
- **Financial institutions.** Several participants raised issues that are unique to financial institutions, such as the scope of the Gramm-Leach-Bliley Act exemption and whether marketing activities of financial institutions or selling of financial portfolios would be subject to the CCPA. [See our [article](#) for further discussion, and join our biweekly CCPA financial services industry comments [calls](#).]

The remaining CCPA public forums will be held on February 5 (Sacramento), February 13 (Fresno), and March 5 (Stanford). Watch our [video](#) on letting your voice be heard. We are organizing comments for businesses to be anonymized and submitted in a report to the OAG. Please send us your comments through this [portal](#). Also, take advantage of our CCPA readiness [survey](#) to benchmark your compliance approach and efforts with other companies. We encourage you to take full advantage of the many opportunities to be heard. California is not alone: Washington introduced CCPA-like legislation earlier this month. Read our client update on the Washington privacy bill [here](#).

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